

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION # 05-30008-MAP

DOUGLAS ALBERT,)
Plaintiff)
v.)
MICHAEL THOMAS, et al)
Defendants)

FILED
MAR 10 2005
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON

JOINT STATEMENT UNDER RULE 16

Now come the parties in the above-captioned case and state they have conferred pursuant to the Rule 16, and propose the following discovery plan and schedule for filing of motions.

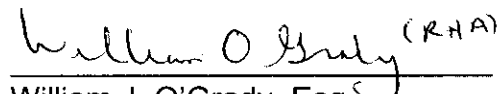
1. **Automatic discovery** pursuant to Local Rule 26.2 will be complied with by April 15, 2005.
2. **Non-expert Interrogatories and Requests for Production.** The parties contemplate the written discovery be served by May 15, 2005.
3. **Non-expert Depositions.** The parties agree that non-expert depositions be completed by October 15, 2005.
4. **Expert witness disclosures.** The parties agree that the plaintiff and defendant designate experts by December 15, 2005.
5. **Expert Interrogatories and Depositions.** The parties contemplate that expert interrogatories be served by February 15, 2006 and expert depositions be completed by February 15, 2006.


6. **Motions Dispositive.** The parties agree that Rule 56 motions be filed by March 15, 2006, oppositions filed by April 15, 2006, and that oral arguments be set down thereafter.
7. **Final Pre-trial Conference.** The parties agree that a final pre-trial conference be held in Spring, 2006 and that a trial date be set for the Fall of 2006.
8. **Magistrate-Judge Trial.** The parties do not consent to trial before a Magistrate-Judge at this time.

CERTIFICATION

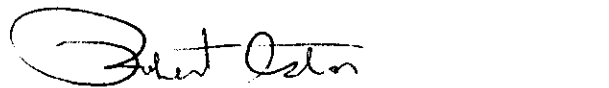
The undersigned hereby certify that they have conferred with their respective clients regarding a budget for various courses of litigation and the possibility of alternative dispute resolution.

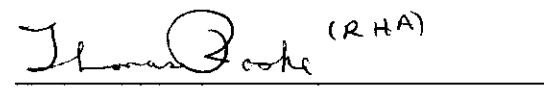
With Assent:


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Respectfully submitted,


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